

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**JEREMY M. GLAPION,**

Plaintiff,

v.

**RENOVATION REFERRAL, LLC  
d/b/a SOLAR MEDIA TEAM;  
GABRIEL SOLOMON SR.**

Defendant.

Civil Case No.: 21-cv-599

**AFFIDAVIT IN SUPPORT OF MOTION FOR DEFAULT JUDGMENT**

I, Jeremy M. Glapion, declare as follows:

1. I am an attorney and Plaintiff in the above-entitled action and I am familiar with the file, records, and pleadings in this matter.
2. The summons and complaint were filed on January 12, 2021.
3. Defendant Gabriel Solomon Sr. was served on January 4, 2022.
4. An affidavit of service is attached hereto.
5. As Defendant Solomon is also the registered agent for Defendant Renovation Referral, LLC, this service included a summons for both Defendant Solomon and Defendant Renovation Referral.
6. Defendants' responses were due on January 25, 2022.
7. On January 24, 2022, Defendant Solomon asked, via email, for an extension to February 1. Plaintiff agreed.

8. No answer or other response to the complaint was filed on February 1.

9. On February 2, 2022, I followed up with Defendant via email and stated that I would move for default on February 4, 2022.

10. On February 11, I requested entry of default in this matter.

11. On February 14, the clerk entered default against both Defendants.

12. On February 17, Plaintiff again emailed Defendant Solomon to inform him of the entry of default.

13. To date, no answer has been filed, and Defendant Solomon has not responded to Plaintiff's February 2 email or communicated with Plaintiff since January 24.

14. A copy of Plaintiff's entry of default filings were delivered via certified mail to the same address at which Defendant Solomon was previously served and signed for by "Gabe."

15. My Google Voice number ending in 9268 has only been used for personal purposes and is registered to me personally, including to my personal email address.

16. At no point did I consent to calls from, or do business with, Defendants, separately or jointly.

17. I have never provided my telephone number ending in 9268 to Defendants, separately or jointly.

18. After cross checking the call log Ytel produced with the calls and voicemails in my Google Voice voicemail folder, all calls on the call log with a duration of 12 seconds left a prerecorded voicemail saying “Good bye.”

19. There are 102 such calls.

20. I have uploaded an example of such a call for review at <https://bit.ly/3pZXNr7> (which will redirect to my private sharefile link). The voice in all such voicemails is identical to this call. This call is from May 18, 2021.

21. Attached hereto as Exhibit A is a true and correct copy of my communications via email with Defendant Gabriel Solomon.

22. Attached hereto as Exhibit B are true and correct copies of screenshots of Defendant Gabriel Solomon’s Facebook page.

23. Attached hereto as Exhibit C is a true and correct copy of the emailed subpoena response from Onvoy/Inteliquent.

24. Attached hereto as Exhibit D is a true and accurate copy of the filed 2021 annual report for Renovation Referral LLC.

25. Attached hereto as Exhibit E are true and accurate screenshots of Defendants’ website, [www.solarmediateam.com](http://www.solarmediateam.com), as of the date of this Declaration,

26. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

**Dated:** March 11, 2022

s/ Jeremy M. Glapion  
Jeremy M. Glapion  
**THE GLAPION LAW FIRM, LLC**  
1704 Maxwell Drive  
Wall, New Jersey 07719  
Tel: 732.455.9737  
Fax: 732.965.8006  
[jmg@glapionlaw.com](mailto:jmg@glapionlaw.com)

# **EXHIBIT A**



Jeremy Glapion <jmg@glapionlaw.com>

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## Glapion v. Doe Corporation/Solar Media Team

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**Jeremy Glapion** <jmg@glapionlaw.com>  
To: Gabe Solomon <Gabe@solarmediateam.com>

Thu, Feb 17, 2022 at 9:43 AM

Gabe:

Default was entered against you and your company. I will be moving for the actual default judgment next week.

Best,  
Jeremy

--



**Jeremy M. Glapion**

Partner

jmg@glapionlaw.com | 732.455.9737

Glapion Law Firm | www.glapionlaw.com  
1704 Maxwell Drive  
Wall, NJ 07719

On Wed, Feb 02, 2022 at 12:11 AM, Jeremy Glapion <jmg@glapionlaw.com> wrote:

Gabe:

I hope you're feeling better.

As far as I can tell, no answer was filed on 2/1. I will give until 2/4 before I move for default judgment.

Please also advise if you're represented so I can cease direct communication with you, if required.

Best,  
Jeremy

--



**Jeremy M. Glapion**

Partner

jmg@glapionlaw.com | 732.455.9737

Glapion Law Firm | www.glapionlaw.com  
1704 Maxwell Drive  
Wall, NJ 07719

On Mon, Jan 24, 2022 at 9:18 PM, Jeremy Glapion <jmg@glapionlaw.com> wrote:

That's fine. I won't move for default prior to that point.

--



**Jeremy M. Glapion**

Partner

jmg@glapionlaw.com | 732.455.9737

Glapion Law Firm | www.glapionlaw.com

1704 Maxwell Drive  
Wall, NJ 07719

On Mon, Jan 24, 2022 at 5:19 PM, Gabe Solomon <Gabe@solarmediateam.com> wrote:

By Feb 1 would give me sufficient time to properly respond and handle this with an attorney.

Respectfully,

*Gabriel Solomon*

Owner/ CEO



Division of Renovation Referral, LLC.

5379 Lyons Road

Coconut Creek, FL. 33073

Toll Free: 855-711-GO-SMT, Ext 701

[www.solarmediateam.com](http://www.solarmediateam.com)

**“ Your work is going to fill a large part of your life, and the only way to be truly satisfied is to do what you believe is great work. And the only way to do great work, is to love what you do!”**



**Inc 500 Fastest Growing 2016**

**#92 Nationwide**

**#6 Marketing and Advertising**

**#8 in Florida**

**Inc 500 Fastest Growing 2017**

**#141 Nationwide**

**#13 Marketing and Advertising**

**#14 in Florida**

**#19 in Advertising by South FL Business Journal '15-'16**

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**From:** Jeremy Glapion <jmg@glapionlaw.com>

**Date:** Monday, January 24, 2022 at 3:36 PM

**To:** Gabe Solomon <Gabe@solarmediateam.com>

**Subject:** Re: Glapion v. Doe Corporation/Solar Media Team

Gabe:

I am glad you're family is feeling better and I wish you a full recovery as well.

Had you not ignored my emails and ducked my process server, this would have been served (or resolved) long ago.

I see you quoted a January 10 email--I never received this email, and I question whether you actually sent it.

In any event, until when would you like an extension of time to respond?

--



**Jeremy M. Glapion**

Partner

jmg@glapionlaw.com | 732.455.9737

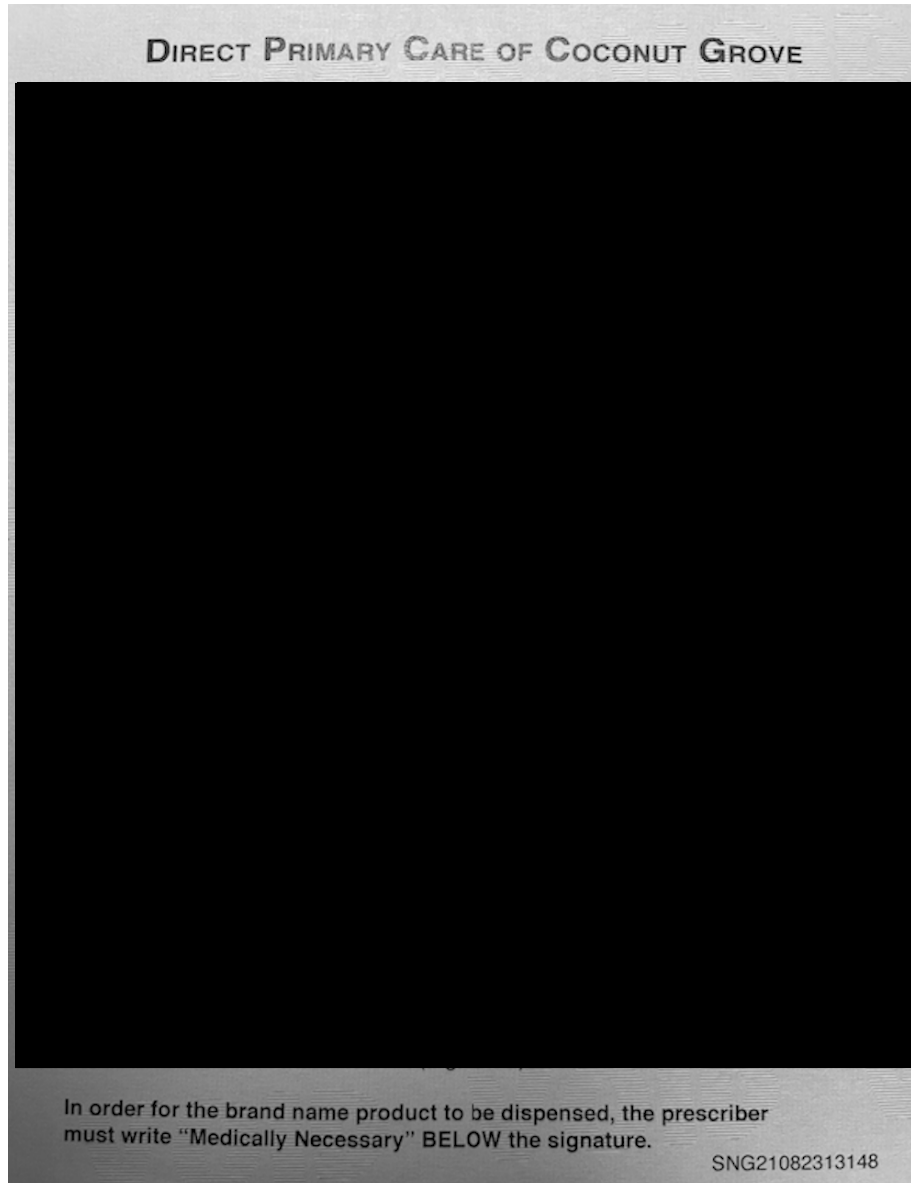
Glapion Law Firm | www.glapionlaw.com

1704 Maxwell Drive  
Wall, NJ 07719



On Mon, Jan 24, 2022 at 8:17 AM, Gabe Solomon <Gabe@solarmediateam.com> wrote:

My whole family has been down with [REDACTED] the last 10 days, luckily my kids [REDACTED] my wife [REDACTED]. Me on the other hand [REDACTED] I went on Thursday to get the [REDACTED] done the state offers and have been dealing with [REDACTED] since that day. I was hoping to feel better by now yesterday my [REDACTED] but I woke up again today [REDACTED] and can [REDACTED]. I haven't been hardly able to look at a computer screen or eat let alone get on the phone, I had an appt set last week with an attorney for a response clearly was the last thing on my mind. Attorney who I used in the past wanted way too much to file a response and deal with this I just haven't been able to deal with this in my condition. I even attached a shot of the script I got so I can get the [REDACTED] I need an extension so I can deal with this when im better, its difficult to even type this email right now.



Respectfully,

*Gabriel Solomon*

Owner/ CEO



Division of Renovation Referral, LLC.

5379 Lyons Road

Coconut Creek, FL. 33073

Toll Free: 855-711-GO-SMT, Ext 701

[www.solarmediateam.com](http://www.solarmediateam.com)

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**Inc 500 Fastest Growing 2017**

**#141 Nationwide**

**#13 Marketing and Advertising**

**#14 in Florida**



**#19 in Advertising by South FL Business Journal '15-'16**

**From:** Gabe Solomon <Gabe@solarmediateam.com>  
**Date:** Monday, January 10, 2022 at 7:33 PM  
**To:** Jeremy Glapion <jmg@glapionlaw.com>  
**Subject:** Re: Glapion v. Doe Corporation/Solar Media Team

There is nothing to discuss, I will have a response filed. Your claims are incorrect and false. DIDs are recycled apparently and resold. We don't leave voicemails, we don't use any pre recorded technology at all of which I can easily prove, we have live telemarketers who speak directly with people whose inquired about solar, and your claim that we called 100 times is insane. We don't do anything but speak to homeowners about solar, never in my life have I done any work with anything relating to medical. I have no clue who Global labs are. Moreover the fact that you're a TCPA attorney who owns Google voice numbers that are DNC listed, that aren't answered, and I guess you call back who calls those numbers in a scheme to entrap cases in order to earn additional money through settlements is even more interesting. Several cases have surfaced about this practice, and you being a TCPA attorney representing himself, your then serving me with this in some scheme to force me into a settlement with your false accusations.

Respectfully,

*Gabriel Solomon*

Owner/ CEO



Division of Renovation Referral, LLC.

5379 Lyons Road

Coconut Creek, FL. 33073

Toll Free: 855-711-GO-SMT, Ext 701

[www.solarmediateam.com](http://www.solarmediateam.com)

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**Inc 500 Fastest Growing 2017**

**#141 Nationwide**

**#13 Marketing and Advertising**

**#14 in Florida**

**#19 in Advertising by South FL Business Journal '15-'16**

---

**From:** Jeremy Glapion <jmg@glapionlaw.com>

**Date:** Wednesday, January 5, 2022 at 3:42 PM

**To:** Gabe Solomon <Gabe@solarmediateam.com>

**Subject:** Re: Glapion v. Doe Corporation/Solar Media Team

Gabe:

With service done, please let me know if you'd like to discuss. The window for that is closing for now.

Best,

Jeremy

--

**Jeremy M. Glapion**

Partner



jmg@glapionlaw.com | 732.455.9737

Glapion Law Firm | www.glapionlaw.com

1704 Maxwell Drive  
Wall, NJ 07719

On Wed, Dec 22 2021 at 2:59 PM, Jeremy Glapion <jmg@glapionlaw.com> wrote:

Gabe:

I hope you're well. We've tried serving you at your Orange Grove Blvd address, which is still listed as Saucy Films' address, but were told you moved. Could you provide your current address for service?

Thanks!

--



**Jeremy M. Glapion**

Partner

jmg@glapionlaw.com | 732.455.9737

Glapion Law Firm | www.glapionlaw.com

1704 Maxwell Drive  
Wall, NJ 07719

On Tue, Oct 05, 2021 at 11:59 AM, Jeremy Glapion <jmg@glapionlaw.com> wrote:

Gabe:

Your company was served, but my process server has indicated you've been avoiding service of process individually.

I just want to be clear that this isn't going to go away that easily, and if you continue to duck service, I will seek court approval for an alternative method of service.

Please advise.

Best,

Jeremy

--



**Jeremy M. Glapion**

Partner

jmg@glapionlaw.com | 732.455.9737

Glapion Law Firm | www.glapionlaw.com

1704 Maxwell Drive  
Wall, NJ 07719

On Mon, Aug 23, 2021 at 12:18 PM, Jeremy Glapion <jmg@glapionlaw.com> wrote:

I have amended your company and you personally into the complaint.

Please advise if you're willing to accept service via email.

Please also advise if you have counsel, as I do not want to speak directly with a represented party.

Best,

Jeremy

--



**Jeremy M. Glapion**

Partner

jmg@glapionlaw.com | 732.455.9737

Glapion Law Firm | www.glapionlaw.com

1704 Maxwell Drive  
Wall, NJ 07719

On Fri, Aug 20, 2021 at 5:37 PM, Jeremy Glapion <jmg@glapionlaw.com> wrote:

You're free to explain that to the Court. A subpoena to Ytel not only identified your company as the user of the numbers, but provided a CDR showing the dates and times of all the calls to my number.

Not sure how you explain that.

--



**Jeremy M. Glapion**

Partner

jmg@glapionlaw.com | 732.455.9737

Glapion Law Firm | www.glapionlaw.com

1704 Maxwell Drive  
Wall, NJ 07719

On Fri, Aug 20 2021 at 5:35 PM, Gabe Solomon <Gabe@solarmediateam.com> wrote:

Sir, this is 100% inaccurate. Im reading this and you have the wrong company. First off I closed my call center. Even reading your complaint, when we were making calls previous to closing we never left voice messages. We only marketed for solar. My company never did anything with travel or medical or even had the technology to leave voice messages. All we did was follow up with people who requested information about solar, we would speak to them live, and not once left any voice messages, and after verifying info we would have them speak with a sales person. This is impossible, this was not me. Global labs? I have no clue who this Global labs is. Ive never in my life heard of such company nor did any business with anyone but solar. I work from home and I do consulting for solar companys. I was forced to close up my office as I could no longer afford to maintain the call center operations.

You need to speak to this Global Research Labs, what in the world would they have to do with a solar marketing company? I do not have nor did I have any type of system to leave voice messages nor would I ever conduct illegal press 1 campaigns at any time.

Respectfully,

*Gabriel Solomon*

---

**From:** Jeremy Glapion <jmg@glapionlaw.com>

**Date:** Friday, August 20, 2021 at 5:10 PM

**To:** Gabe Solomon <Gabe@solarmediateam.com>

**Subject:** Glapion v. Doe Corporation/Solar Media Team

Gabe:

I hope this finds you doing well.

On January 12, I filed the attached complaint against Doe Corporation, seeking to identify the caller spamming my phone. Case No. 21-cv-599, District of New Jersey.

Through subpoenas, that caller has been identified as Renovation Referral LLC d/b/a Solar Media Team. Since June 1, 2020, there have been at least 108 prerecorded telemarketing calls made to my telephone number 617-575-9268.

I intend to amend your company into my complaint, but if you're amenable to a resolution prior to that, please let me know.

Best,

Jeremy

--



**Jeremy M. Glapion**

Partner

jmg@glapionlaw.com | 732.455.9737

Glapion Law Firm | [www.glapionlaw.com](http://www.glapionlaw.com)

1704 Maxwell Drive  
Wall, NJ 07719



# **EXHIBIT B**



## Gabe Solomon Sr.

 Message

Posts

About

Friends

Photos

Videos

Check-ins

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### Intro

Founder of Solar Media Team, a 2 time INC 500 fastest growing co, FL Fast 100, #19 Marketing SFLBJ.




### Posts

 Filters



**Gabe Solomon Sr.** updated his profile picture.

February 15 at 7:19 AM · 







I Fullana  
:haelfullana.com



Gabe Solomon Sr.

February 15 at 7:19 AM · 🌐



34

9 Comments 1 Share

➦ Share



wow....looking good..lol



2

3w



Michael Fullana it's the guy taking the picture making him look good 🤔🤔



2

3w



I'm just surprised he was able to get those muscles to fit in the picture



1

3w



Mike Apples replied · 4 Replies



Was this right before you went over the berm? 🤔🤔🤔🤔



2

3w



Gabe Solomon Sr.  
Everett Cooper ah yeah right no. That happened on Sunday, i had diff jersey on. lol



2

3w

# EXHIBIT C





Jeremy Glapion <jmg@glapionlaw.com>

---

**Re: Inteliquent Subpoena (210691)**

---

**Scott Kellogg** <Scott.Kellogg@inteliquent.com>  
To: Jeremy Glapion <jmg@glapionlaw.com>

Thu, Aug 19, 2021 at 12:07 AM

As previously confirmed, we are in receipt of the processing fee for this matter and having fulfilled our contractual obligations for disclosure of this matter to our relevant customers, we can not provide this compliance response.

As previously discussed, Inteliquent generally does not have end user subscribers. Rather, Inteliquent's customers are typically other service providers (wireline, wireless, VOIP, etc.) to whom we provide wholesale communications services, delivering traffic between the networks of such providers involving telephone numbers that were either: (a) allocated to Inteliquent and released to such a service provider customer, or else (b) owned by a service provider customer who has ported the number to Inteliquent. In either case, the telephone number belongs to another service provider, who has the end user subscriber(s) utilizing the number and who will have records for all calls relating to the number (we will have no relationship with or information about the end user subscribers of our wholesale customers).

Inteliquent's wholesale customer for the following telephone numbers is Ytel for the entirety of the target interval of 6/16/20 to present, except where indicated:

561-332-2717  
719-259-6508 (note: this number was stated twice in the list)  
719-626-4702  
817-252-4966  
941-214-7243  
941-220-5585 (note: this number was stated twice in the list)  
941-220-5649  
941-220-5658  
941-220-5681  
941-220-5725  
941-229-5042  
941-229-5044  
941-229-5056  
941-229-5065  
941-229-5097  
941-229-5103  
941-229-5140  
941-229-5175  
941-229-5273  
941-229-5279  
941-229-5576  
941-229-5901  
941-229-5936  
941-229-5956  
941-260-2112  
941-300-0079  
941-499-0950  
941-499-2107  
941-499-2129  
941-499-2368

941-499-2455  
941-499-2513  
941-499-2586  
941-499-2647  
941-499-2702  
941-499-2959  
941-584-3763  
941-584-3792  
941-584-3836 (ONLY for portion that is 6/16/20 to 12/14/20; number is unassigned thereafter)  
941-769-9526  
941-769-9801  
941-769-9849  
941-833-7236  
941-833-7411 (ONLY for portion that is 6/16/20 to 12/14/20; number is unassigned thereafter)  
941-919-2276  
941-919-2473 (ONLY for portion that is 6/16/20 to 12/14/20; number is unassigned thereafter)  
941-919-2752

For the following numbers, there was divided history during the target interval, with the numbers initially in use with Ytel (for the period of 6/16/20 to 12/14/20). The numbers were the discontinued and not allocated for use by any customers of Inteliquent from 12/15/20 to a specified date in May 2021, and thereafter, have been in use by a different customer, Plivo:

941-214-7355 – Ytel; then unallocated as of 12/15/20; then Plivo 5/21/21 to present  
941-220-5835 – Ytel; then unallocated as of 12/15/20; then Plivo 5/21/21 to present  
941-229-5105 – Ytel; then unallocated as of 12/15/20; then Plivo 5/22/21 to present

Please note that we no record of the following numbers ever being allocated to or in service with our company for any service provider customers. It appears as if you have contacted us in error concerning the same and will need to further consult your resources to determine the proper party to contact in this matter for the following:

408-398-8024  
941-213-2096  
941-716-8981

Our records provide the following contact information for Ytel and Plivo:

YTEL  
26632 Towne Centre Dr., Suite 300  
Lake Forest CA 92610  
<https://www.ytel.com/company/contact/>  
Support: 800-382-4913 (M to F, 6 am to 6 pm Pacific)  
Email: [legal@ytel.com](mailto:legal@ytel.com)

Plivo  
340 S. Lemon  
Walnut, CA 91789  
<https://www.plivo.com/about/>  
[support@plivo.com](mailto:support@plivo.com)

Please let me know if you have any questions. Kind regards.

550 West Adams St., Suite 900  
Chicago, IL 60661



---

**From:** Scott Kellogg <Scott.Kellogg@inteliquent.com>  
**Sent:** Wednesday, August 18, 2021 3:02 PM  
**To:** Jeremy Glapion <jmg@glapionlaw.com>  
**Subject:** Re: Inteliquent Subpoena (210691)

Yes, I did pick it up. Thank you. We will provide the answer by tomorrow at the latest.

Scott Kellogg | Inteliquent | o: 312-384-8086  
550 West Adams St., Suite 900  
Chicago, IL 60661



---

**From:** Jeremy Glapion <jmg@glapionlaw.com>  
**Sent:** Wednesday, August 18, 2021 8:42 AM  
**To:** Scott Kellogg <Scott.Kellogg@inteliquent.com>  
**Subject:** Re: Inteliquent Subpoena (210691)

//EXTERNAL Sender: jmg@glapionlaw.com from United States.

Did you receive? It arrived at 11:32 am central yesterday.

--



**Jeremy M. Glapion**

Partner

jmg@glapionlaw.com | 732.455.9737

Glapion Law Firm | www.glapionlaw.com

1704 Maxwell Drive

Wall, NJ 07719

On Mon, Aug 16, 2021 at 2:36 PM, Scott Kellogg <Scott.Kellogg@inteliquent.com> wrote:

Thanks -- if it arrives by 6 pm as it appears, I should be able to grab it tomorrow. I will confirm when I have it.

Scott Kellogg | Inteliquent | o: 312-384-8086  
550 West Adams St., Suite 900  
Chicago, IL 60661



---

**From:** Jeremy Glapion <jmg@glapionlaw.com>  
**Sent:** Monday, August 16, 2021 11:08 AM

**To:** Scott Kellogg <Scott.Kellogg@inteliquent.com>

**Subject:** Re: Inteliquent Subpoena (210691)

//EXTERNAL Sender: jmg@glapionlaw.com from United States.

It will arrive tomorrow. Tracking: EJ957590278US

--



**Jeremy M. Glaption**

Partner

jmg@glapionlaw.com | 732.455.9737

Glaption Law Firm | www.glapionlaw.com

1704 Maxwell Drive

Wall, NJ 07719

On Mon, Aug 16 2021 at 11:08 AM, Scott Kellogg <Scott.Kellogg@inteliquent.com> wrote:

Great - please do send tracking info when you have it. Please note, I will be off from this Friday to next Thursday, and so i will either need to get it by 8/19 or try to coordinate through someone else to come and look for it and try to respond in the interim.

Scott Kellogg | Inteliquent | o: 312-384-8086

550 West Adams St., Suite 900

Chicago, IL 60661



---

**From:** Jeremy Glaption <jmg@glapionlaw.com>

**Sent:** Monday, August 16, 2021 9:32 AM

**To:** Scott Kellogg <Scott.Kellogg@inteliquent.com>

**Subject:** Re: Inteliquent Subpoena (210691)

//EXTERNAL Sender: jmg@glapionlaw.com from United States.

Will send out today. Thank you!

--



**Jeremy M. Glaption**

Partner

jmg@glapionlaw.com | 732.455.9737

Glaption Law Firm | www.glapionlaw.com

1704 Maxwell Drive

Wall, NJ 07719

On Wed, Aug 11, 2021 at 8:09 PM, Scott Kellogg <Scott.Kellogg@inteliquent.com> wrote:

This message confirms that we will complete the work necessary to enable our compliance response on or about 8/19/21 and for the low end ICB fee of \$200.00. Per our prior exchange, please make the check payable to "Inteliquent" and include with it the hard copy of the subpoena to satisfy our Policy (address below – can be sent to my attention). If we have the check in hand by that 8/19/21, we should be able to reply as noted at that time.



As previously discussed, please consider transmitting the same via certified mail or commercial delivery to ensure there is tracking (our offices have not re-opened yet) and provide the tracking number to me so that I can coordinate timely retrieval.

Scott Kellogg | Inteliquent | o: 312-384-8086  
550 West Adams St., Suite 900  
Chicago, IL 60661



---

**From:** Jeremy Glapion <jmg@glapionlaw.com>  
**Sent:** Thursday, August 5, 2021 6:05 PM  
**To:** Scott Kellogg <Scott.Kellogg@inteliquent.com>  
**Subject:** Re: Inteliquent Subpoena (210691)

//EXTERNAL Sender: jmg@glapionlaw.com from United States.

That works for me. Thank you.

--



**Jeremy M. Glapion**

Partner

jmg@glapionlaw.com | 732.455.9737

Glapion Law Firm | www.glapionlaw.com  
1704 Maxwell Drive  
Wall, NJ 07719

On Thu, Aug 5 2021 at 7:04 PM, Scott Kellogg <Scott.Kellogg@inteliquent.com> wrote:

Confirming receipt. Also to further advise here of our further expectations for processing: I believe that based on preliminary review, we will be able to process it at the low-end estimate we had previously noted (~\$200.00) and we probably will be able to provide our response within about 2 weeks.

I will reply further with the firm processing fee figure probably inside of about a week. That should hopefully allow sufficient time for you to tender the same (along with the original subpoena as previously discussed) by the time we are ready to provide the compliance response. Kind regards.

Scott Kellogg | Inteliquent | o: 312-384-8086  
550 West Adams St., Suite 900  
Chicago, IL 60661



---

**From:** Jeremy Glapion <jmg@glapionlaw.com>  
**Sent:** Tuesday, August 3, 2021 1:12 PM  
**To:** Scott Kellogg <Scott.Kellogg@inteliquent.com>  
**Subject:** Re: Inteliquent Subpoena

//EXTERNAL Sender: jmg@glapionlaw.com from .

That sounds reasonable. I suspect all of these customers will be the same, because the content and pattern of calls is nearly identical.

With that in mind, please see attached subpoena and excel file listing the numbers. I'm also including the Court order granting leave to serve these early subpoenas.

Can you confirm receipt and let me know if you need anything further? And also keep me posted on how long until you can produce responsive documents?

--



**Jeremy M. Glapion**

Partner

jmg@glapionlaw.com | 732.455.9737

Glapion Law Firm | www.glapionlaw.com

1704 Maxwell Drive

Wall, NJ 07719

On Sat, Jul 31, 2021 at 2:55 PM, Scott Kellogg <Scott.Kellogg@inteliquent.com> wrote:

A rolling response won't make a difference for timing up front, as our process is that we first need to identify the customer(s) based on the numbers specified, and only thereafter, we must then send disclosure notices to them, per contract provisions. We cannot provide a substantive response until we satisfy the relevant notice provisions -- including waiting the specified interval (notice obligations vary by contract) absent customer waiver of the same. For this reason, I had mentioned that if desired, after the initial step (reviewing all numbers to identify customer(s)) we could pause and advise if there are many customers at issue, as this could make a significant difference for the process of reviewing contracts and going through the notice process (and in turn, for processing fee).

Scott Kellogg | Inteliquent | o: 312-384-8086

550 West Adams St., Suite 900

Chicago, IL 60661



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**From:** Jeremy Glapion <jmg@glapionlaw.com>

**Sent:** Friday, July 30, 2021 5:52 PM

**To:** Scott Kellogg <Scott.Kellogg@inteliquent.com>

**Subject:** Re: Inteliquent Subpoena

//EXTERNAL Sender: jmg@glapionlaw.com from United States.

---

Thank you for the response and courtesy. I am pretty sure that all 55 will be the same customer. I will work on getting those to you ASAP.

I'm also willing to accept a rolling response which may prove more efficient if you can get the first few "test" results out quickly. I can then turn around and subpoena the customer assuming my suspicion is correct.

--

**Jeremy M. Glapion**

Partner



jmg@glapionlaw.com | 732.455.9737

Glapion Law Firm | www.glapionlaw.com  
1704 Maxwell Drive  
Wall, NJ 07719

On Fri, Jul 30 2021 at 6:14 PM, Scott Kellogg <Scott.Kellogg@inteliquent.com> wrote:

Thanks for reaching out in advance. For such a quantity of numbers, it's difficult to project, as the cost can be significantly different if all 55 are with 1 customer vs. with dozens of different customers. A best case scenario estimate is \$200 (e.g., if numbers are all with 1 or just a few customers).

What we could do is let you know when we've done the 1<sup>st</sup> step (identified the relevant customers for all of the numbers). We could offer a further estimate then, and you could always decide to scale back the scope at that time as well to some subset of the numbers.

We can work with you for email service given the circumstances. You can email it to my attention and then send the original when transmitting the fee (please note: a check will eventually be necessary – we cannot accept credit cards, etc.; however, this hopefully would allow you more time to plan around sending it.).

Please do issue it with the 20 business days in section 4.2 of our policy. With such a quantity of numbers, I would expect that as the potential need.

Scott Kellogg | Inteliquent | o: 312-384-8086  
550 West Adams St., Suite 900  
Chicago, IL 60661



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**From:** Jeremy Glapion <jmg@glapionlaw.com>  
**Sent:** Friday, July 30, 2021 2:27 PM  
**To:** Scott Kellogg <Scott.Kellogg@inteliquent.com>  
**Subject:** Inteliquent Subpoena

//EXTERNAL Sender: jmg@glapionlaw.com from United States.

---

Hi Scott:

I intend to serve a civil subpoena for information identifying the service provider for approximately 55 Onvoy/Inteliquent telephone numbers which have been spamming my telephone.

Please advise the anticipated ICB fee.

Please also let me know if Inteliquent would be willing to accept service of this subpoena via email. While I recognize your policy is mail only, I am trying to avoid a trip to the post office during the height of this Delta variant, as I have a newborn at home who cannot be vaccinated.

Best,  
Jeremy

--



**Jeremy M. Glapion**  
Partner

jmg@glapionlaw.com | 732.455.9737

Glaption Law Firm | www.glaptionlaw.com  
1704 Maxwell Drive  
Wall, NJ 07719

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# EXHIBIT D

**2021 FLORIDA LIMITED LIABILITY COMPANY ANNUAL REPORT****FILED**

DOCUMENT# L13000004931

**Apr 03, 2021****Entity Name:** RENOVATION REFERRAL LLC**Secretary of State****8940220981CC****Current Principal Place of Business:**5379 LYONS ROAD  
606  
COCONUT CREEK, FL 33073**Current Mailing Address:**5379 LYONS ROAD  
606  
COCONUT CREEK, FL 33073 US**FEI Number:** 45-3552899**Certificate of Status Desired:** No**Name and Address of Current Registered Agent:**SOLOMON, GABRIEL ALAN MGR  
5379 LYONS ROAD  
606  
COCONUT CREEK, FL 33073 US*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.***SIGNATURE:** GABRIEL SOLOMON

04/03/2021

Electronic Signature of Registered Agent

Date

**Authorized Person(s) Detail :**

Title	MGR
Name	SOLOMON, GABRIEL
Address	5379 LYONS ROAD 606
City-State-Zip:	COCONUT CREEK FL 33073

*I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am a managing member or manager of the limited liability company or the receiver or trustee empowered to execute this report as required by Chapter 605, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.*

**SIGNATURE:** GABRIEL SOLOMON**MGR****04/03/2021**

Electronic Signature of Signing Authorized Person(s) Detail

Date

# **EXHIBIT E**

OVER A MILLION 100% EXCLUSIVE SOLAR LEADS  
GENERATED

## We Put Our Energy Into Your Business With Our Solutions!

Scroll Down



**For Solar Installers looking to acquire new prospects**, we can help you find new customers and expand your business with an impressive ROI. Lead acquisition for any business is the life blood necessary for a company to sustain and succeed in today's market. We put all our energy into knowing what your businesses goals are and by utilizing our marketing solutions, we will exceed those goals and give your company the competitive edge it needs to maximize profits.



## About Us

Our sole purpose is emphasizing in solar lead generation by utilizing marketing channels that offer a 100% contact rate. This ensures a high ROI, and low cost per acquisition. Solar Media Team's founder has built the company on a foundation stemming from years of experience in sales. By employing creative out of the box thinking, and execution, we get the job done right the first time.

### LOCATION

5379 Lyons Road, Suite 606

Coconut Creek, FL. 33073